

**AFFIDAVIT**

I, Amy L. Chandler, a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), being duly sworn, depose, and state as follows:

1. I have been employed as a Special Agent with the FBI since April 11, 2010, and am currently assigned to the Minneapolis Division, Minot Resident Agency. My duties include, among other things, the investigation of violent crimes occurring within Indian Country. While employed with the FBI, I have investigated and participated in investigations involving federal criminal violations related to child sexual exploitation, human trafficking, sexual assault, narcotics, and violent crimes.
2. Prior to being employed as a Special Agent with the FBI, I was an Assistant State Attorney for the 9<sup>th</sup> Judicial Circuit for Orange and Osceola Counties in Florida for more than four years. During that time, I reviewed, charged, and prosecuted criminal cases involving crimes against children, child pornography, sexually based offenses, violent crimes, and drug offenses.
3. As a Federal Agent, I am authorized to investigate violations of the laws of the United States, and to execute warrants issued under the authority of the United States.
4. This Affidavit is in support of an application for an arrest warrant of JEFFREY SAHL FERRIS, DOB: 1966.
5. The statements contained in this Affidavit are based in part on: information provide by other agencies, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation; and my experience, training, and background as a Special Agent with the FBI. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to believe that JEFFREY SAHL FERRIS, DOB: 1966, committed the below-described offenses, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part.

6. As will be shown below, there is probable cause to believe that JEFFREY SAHL FERRIS committed violations of Title 18, United States Code Sections 113(a)(3), 1152.

#### **LEGAL AUTHORITY**

7. Title 18, U.S.C. §113(3)(a) prohibits a person from committing an assault with a dangerous weapon, with the intent to do bodily harm.

#### **BACKGROUND OF THE INVESTIGATION**

8. On or about April 24, 2020, seven minor males were riding dirt bikes and four-wheelers within the exterior boundary of the Turtle Mountain Indian Reservation ("TMIR"). Later in the day, the boys stopped at a field with abandoned buildings in the area of 4488 Highway 281, Belcourt, North Dakota 58316, which is located within the exterior boundaries of TMIR.
9. On or about April 27, 2020, SA Chandler interviewed B.B., DOB XX/XX/2005, a 15-year-old male, about what happened on April 24, 2020. B.B. reported that he was riding a dirt bike with his six minor friends when they stopped at the above-listed property. The boys did not go inside any of the abandoned buildings. While they were hanging out in that area, the boys saw a Jeep driving extremely fast towards them. The boys got scared and jumped onto their four-wheelers and dirt bikes. The driver of the Jeep never said anything to the boys when he approached them. It initially looked like the Jeep was going to hit S.L., DOB XX/XX/2004. The Jeep then chased after two other boys that were riding a four-wheeler together. The Jeep then followed B.B. B.B. was scared. B.B. tried to take a turn to avoid being hit by the Jeep, but B.B. hit a fence and flew off his bike. B.B. landed on the ground near a tree and was lying on his side. The driver of the Jeep, identified as JEFFREY SAHL FERRIS, got out of the Jeep and pulled a black and silver handgun on B.B. B.B. was "super scared." FERRIS told B.B. to stay on the ground. B.B. laid on the ground and saw FERRIS put the gun in his pocket. FERRIS kicked B.B.'s helmet that was on the ground. FERRIS asked B.B. why he was hanging out with that "fucking pussy kid named" S.L. FERRIS said he was going to call the police and that he "got one." B.B.'s friends were able

to get away to get help before B.B. crashed. B.B. rode his dirt bike in that area before and never had any problems.

10. On or about April 27, 2020, SA Chandler interviewed E.D., DOB XX/XX/2005, a 15-year-old male, about what happened on April 24, 2020. E.D. was hanging out with his six minor friends when they stopped at the above-listed property. E.D. did not see any "No Trespassing" signs on or around the property. One of the other boys stated he saw someone at the end of the crossing. The boys saw an olive-green colored Jeep driven by FERRIS headed towards them at a high rate of speed. The boys got scared and got on their four-wheelers and dirt bikes. E.D. saw the Jeep head towards S.L. and nearly hit him. The Jeep then chased after E.D. and another boy. The boys fled from the property because they thought FERRIS was going to hit them with the Jeep. FERRIS never got out of the Jeep or said anything to the boys. The boys went to Z.P.'s house to get help. The boys told Z.P.'s parents what happened and flagged down a Bureau of Indian Affairs (BIA) police officer and reported what happened when they realized B.B. was not with them. When the boys, parents, and law enforcement arrived back at the area, they found B.B. and FERRIS there. B.B. told law enforcement that FERRIS had a gun in his pocket. Law enforcement searched FERRIS and found a gun in FERRIS' pocket.
11. On or about April 27, 2020, SA Chandler interviewed K.D., DOB XX/XX/2005, a 14-year-old male, about what happened on April 24, 2020. K.D. was hanging out with his six minor friends when they stopped at the above-listed property. The boys did not go into any of the buildings on the property. The boys looked up and saw an olive-green colored Jeep that was driving really fast towards them. The boys were really scared. They got on their four-wheelers and dirt bikes to leave the area because they were scared. The boys went to Z.P.'s house to get help. When they got there, they realized B.B. was not with them. The boys saw a police officer at a gas station and told the officer what happened. The officer and boys returned to find B.B. However, K.D. stayed back because he was too scared and shaken up to go back. The driver of the Jeep did not say anything to the boys, nor did he try to tell him anything. According to K.D., it felt like the driver

was trying to hit the boys and kill them. K.D. was really scared and is scared to even go outside now. K.D. has ridden in that area before and never had a problem.

12. On or about April 27, 2020, SA Chandler interviewed J.M., DOB XX/XX/2005, a 15-year-old male, about what happened on April 24, 2020. J.M. was hanging out with his six minor friends when they stopped at the above-listed property. The boys did not go into any of the abandoned buildings on the property. The boys were on the property for only a few minutes when they heard a noise towards the main road. When they looked over, they saw an olive or green colored Jeep "flying down the road." The boys immediately got on their dirt bikes and four-wheelers to leave. Some of the boys had trouble getting their bikes and four-wheelers started, so the driver of the Jeep, FERRIS, got very close to some of them. J.M. was so scared. FERRIS started chasing J.M. in the Jeep. J.M. was going to stop because he initially thought FERRIS was just going to holler at him, but then J.M. noticed FERRIS was trying to hit him with the Jeep. J.M. thought FERRIS was going to hit him because FERRIS was driving so fast and did not stop chasing the boys. When FERRIS missed J.M., FERRIS started chasing the other boys. B.B. ended up crashing into a fence. When the boys got to Z.P.'s house, they realized B.B. was not with them. The boys waved down a police officer and told him what happened. The boys and officer returned to the property and J.M. saw FERRIS standing over B.B. who was still on the ground. FERRIS refused to tell the police where the gun was. B.B. told the police that the gun was in FERRIS' pocket. The police officers pulled the gun out of FERRIS' pocket and unloaded it. There was a bullet in the chamber. J.M. has been on that property before and never had any problems. No one ever told J.M. that he could not be on that property.
13. On or about April 27, 2020, SA Chandler interviewed S.L., DOB XX/XX/2004, a 14-year-old male, about what happened on April 24, 2020. S.L. was hanging out with his six minor friends when they stopped at the above-listed property. The boys were hanging out on the property when W.D. saw someone coming towards them in a dark green colored Jeep. The driver was identified as FERRIS. The boys ran to their dirt bikes and four-wheelers to get away. According to S.L.,

the Jeep seemed like it was traveling approximately 80 mph. S.L. could not get his dirt bike started quickly enough because it was kick start. S.L. moved his bike near a wall and the Jeep almost hit S.L. S.L. was scared FERRIS was going to hit him. The Jeep went after Z.P., but Z.P. got away. S.L. could not see anything because of where he was, so he took off to Z.P.'s house. When they got there, the boys realized B.B. was not with them. S.L. later learned FERRIS pointed a gun at B.B. FERRIS refused to tell the police where the gun was. B.B. told the police the gun was in FERRIS' pocket. S.L. saw the police officer retrieve the gun from FERRIS and unload the "clip." There was a round in the chamber. FERRIS used to be S.L.'s neighbor in BIA housing in Belcourt.

14. On or about April 27, 2020, SA Chandler interviewed Z.P., DOB XX/XX/2005, a 15-year-old male, about what happened on April 24, 2020. Z.P. was hanging out with his six minor friends when they stopped at the above-listed property. The boys did not go inside any of the buildings on the property. W.D. said he saw someone in the crossing. When the boys looked up, they saw a Jeep headed right towards them. The boys ran to get on their four-wheelers and dirt bikes. FERRIS, the driver of the Jeep, barely missed hitting Z.P. with the Jeep. FERRIS then almost hit S.L. with the Jeep. Z.P. got out of the area as quickly as he could and went to his house. FERRIS drove his Jeep towards the boys at a high rate of speed and almost hit them. Z.P. was freaking out. Z.P. then realized B.B. was not with them. Z.P. told his parents what happened. The boys saw a police officer, flagged him down, and told him what happened. They all returned to the property. B.B. told the police officer that FERRIS had a gun. One of the officers asked FERRIS where the gun was. B.B. told the officer that the gun was in FERRIS' pocket. Law enforcement located the loaded gun in FERRIS' pocket.
15. On or about April 27, 2020, SA Chandler interviewed W.D., DOB XX/XX/2005, a 14-year-old male, about what happened on April 24, 2020. W.D. was hanging out with his six minor friends when they stopped at the above-listed property. W.D. walked towards his dirt bike to turn it off when he looked up and saw a dark green colored Jeep approaching them at "80 mph." W.D. told



his friends he saw the Jeep approaching them. The driver of the Jeep, FERRIS, never got out of the Jeep or said anything to the boys. The boys returned to their four-wheelers and dirt bikes. S.L. could not get his dirt bike started. FERRIS almost hit Z.P. and W.D. It looked like FERRIS was trying to hit the boys with his Jeep. The boys took off to Z.P.'s house and did not realize B.B. was not with them until they got to Z.P.'s house. The boys told Z.P.'s parents what happened. The boys returned to the property with Z.P.'s parents and law enforcement. W.D. saw B.B. lying on the ground. FERRIS had a gun in his pocket. W.D. denied the boys vandalized the property or abandoned buildings.

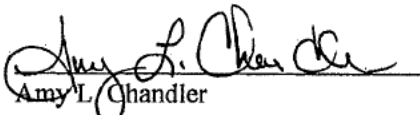
16. On or about April 27, 2020, SA Chandler interviewed Z.P.'s father, KELLY PARISIEN. The above-listed property is located near PARISIEN's residence. The property was owned by HAZEL DEMONTIGNY who is now deceased. DUANE GOURNEAU stayed in DEMONTIGNY's house. The property has been abandoned for 30 to 40 years. PARISIEN and his friend, FRANK WALLETTE, were one of the first people that showed up after the boys reported what happened. PARISIEN saw B.B. lying on the ground near his dirt bike. PARISIEN confronted FERRIS about chasing the boys in his Jeep and told him that the boys were scared. FERRIS just had a blank look on his face like he did not care. B.B. told the police that FERRIS kicked his helmet that was on the ground and that FERRIS had a gun. PARISIEN saw the black and silver handgun. PARISIEN did not see any signs posted on the property telling people to stay off the property. There are trails though the property.
17. Law enforcement responded on April 24, 2020 to the above-listed property and reported that the residence located on the property was abandoned. FERRIS told law enforcement that he went to the property because he saw children vandalizing the property and that they were on the roof. FERRIS drove around with his Jeep and the kids took off with their dirt bikes and four-wheelers. One of the children ran into some branches and fell to the ground. FERRIS advised he had his pistol in his right hand but denied pointing it at anyone. FERRIS reported that he told the child to stay on the ground and the cops were coming. One of the officers asked FERRIS if he had a gun

and where it was. FERRIS advised he had a gun in his right pocket. The officer retrieved the gun from FERRIS' pocket and cleared it. The handgun was a black and silver 9mm Taurus PT111 G2, serial number TKY86292. The gun had a round in the chamber and nine rounds in the magazine. B.B.'s dirt bike was damaged when B.B. crashed into the fence and fell off his dirt bike. FERRIS advised law enforcement that he is not an enrolled member of the tribe. FERRIS provided a written statement to law enforcement stating that he chased the boys in his Jeep, and that he got out of his Jeep after one of the boys crashed with his 9mm in his hand at his side. FERRIS reported that he placed the gun in his pocket before he approached the boy on the ground.

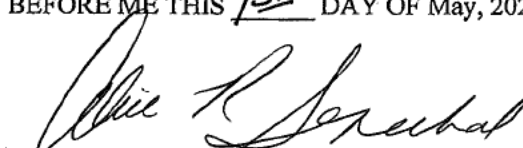
18. According to tribal enrollment records, B.B., DOB XX/XX/2005, is an enrolled member of the Turtle Mountain Band of Chippewa Indians. JEFFREY SAHL FERRIS is not an enrolled member of the Turtle Mountain Band of Chippewa Indians.

**CONCLUSION**

19. Based on the facts set forth above, your Affiant believes that there is probable cause to arrest JEFFREY SAHL FERRIS. Your Affiant respectfully requests that the court issue a warrant for the arrest of JEFFREY SAHL FERRIS for his actions in violation of Title 18 U.S.C. § 113(a), 921, and 1152.

  
Amy L. Chandler  
Special Agent  
Federal Bureau of Investigation

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 1<sup>st</sup> DAY OF May, 2020, via telephone.

  
Alice R. Senechal  
United States Magistrate Judge